

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

ROBERT (BOB) ROSS,	§	
	§	
Plaintiff/Counterclaim Defendant,	§	
	§	
v.	§	Civil Action No. 4:22-cv-00034-Y
	§	
ASSOCIATION OF PROFESSIONAL	§	
FLIGHT ATTENDANTS	§	
MCGAUGHEY, REBER AND	§	
ASSOCIATES, INC, JULIE	§	
HEDRICK, AND ERIK HARRIS,	§	
	§	
Defendants/Counterclaim Plaintiff.	§	

PLAINTIFF'S DISCLOSURES PURSUANT TO F.R.C.P. 26 (a)

Pursuant to this Court's Order of June 13, 2022 (Dkt. No. 13), counsel for Plaintiff/Counterclaim Defendant Robert (Bob) Ross submits these disclosures required by Federal Rule of Civil Procedure 26(a)(1) as follows:

- (i) **the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**
 1. Any and all former and current members of the Board of Directors of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.

2. Any and all former and current national officers of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
3. Any and all staff current and former members of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information, testimony, correspondence, and documentation regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
4. Any and all current and former members of the executive committee of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
5. Any and all current and former members of the in-house and outside legal team of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information and testimony regarding claims for violations of Breach of Fiduciary Duty and Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.

6. Any and all current and former officers, employees, staff members, debt collection agents, contractors, associates Diversified Credit Systems a/k/a McGaughey, Reber and Associates, Inc whose address includes but is not limited to 706 Glencrest Ln Unit A, Tyler, TX 75701 (903) 297-0600. Information and testimony including but limited to claims for violations of Fair Debt Collection Practices Act and Federal Fair Credit Reporting Act.
7. Any and all certified public accountants, accountants, partners, associates, staff members and affiliates of Wood, Stephens & O'Neil, L.L.P., its predecessors, affiliates and assigns whose current address includes but is not limited to 6300 Ridglea Place, Suite 318, Fort Worth, Texas 76116. (817) 377-1700. Information and testimony regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
8. Any and all staff current and former employees of the Association of Professional Flight Attendants and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 1004 West Euless Boulevard, Euless, Texas 76040. (817) 540-0208. Information, testimony, correspondence, and documentation regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
9. Any and all staff current and former employees of the American Airlines, Inc. and its affiliates from January 1, 2015 to current whose current national headquarters location includes but is not limited to 4333 Amon Carter Blvd, Fort Worth, Texas 76155, (817) 963-1234. Information, testimony, correspondence, and documentation regarding claims for violations of Breach of Fiduciary Duty, Breach of Union Constitution, Violation of Member's Bill of Rights under Labor Management Reporting and Disclosure Act.
10. Bob Ross, c/o KD Phillips Law, 5700 Tennyson Parkway, Suite 300, Plano Texas 75024; Topic: Union Practices, Fact Witness

11. Eugenio Vargas, c/o KD Phillips Law, 5700 Tennyson Parkway, Suite 300, Plano Texas 75024; Topic: Union Practices, Fact Witness
12. Nena Martin: 1404 Grizzly Hollow, Wentzville, MO 63385; Topic: Union Practices, Fact Witness
13. Ruben R. Armendariz, Arbitrator, 8610 Cheviot Heights, San Antonio, Texas 78254 (210) 370860; Topic: Union Practices, Fact Witness
14. Dr. Kamalpreet Dulai, McClellan Park Air Force Base, Veterans Administration; 150 Muir Road, Martinez, CA 94553 (925) 372-2000; Topic: Damages
15. Gene Ackerman, Answer Home Loans – 916-835-8684; 6085 Douglas Blvd, Suite 500, Granite Bay, CA 95746 Topic: Damages.

- (ii) **a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**
1. Copy of Arbitration Decision
 2. Transcripts from Arbitration Hearing
 3. Email correspondence between the parties regarding the arbitration
 4. Copy of Transition Agreement
 5. Correspondence from APFA to Plaintiff regarding wages
 6. Social Media Posts
 7. Agreement between APFA and Laura Glading
 8. APFA Constitution and Policies
 9. Affidavits from witnesses
- (iii) **a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and**
- (1) Legal Fees to Date: est. \$61,345.90
 - (2) Arbitration and Costs Assessed in Arbitration Fees: est. \$27,631.60 + Additional Costs
 - (3) Lost Income: est. \$23,420.60
 - (4) Costs incurred in Arbitration: est. \$8,610.72
 - (5) Damages for FCRA violations: est. \$691,637

- (6) Medical Costs: unknown
 - (7) Reputational Harm: unknown
 - (8) Pain and Emotion Suffering: unknown
 - (9) Lost Employment Opportunities: unknown
 - (10) Loss Future Income: unknown
 - (11) Punitive Damages: unknown
- (iv) **for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**
- (1) Robert (Bob was insured per Federal Law mandates; however, all policy documents were left in possession of the Association of Professional Flight Attendants upon his departure in 2018, and no copies were retained, per Union Policy. He has not been provided this information to date, therefore is unable to provide the Defendants with this information.

Date: August 3, 2022

Respectfully Submitted

/s/ Kerri Phillips
KERRI PHILLIPS
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Counsel for Plaintiff Robert "Bob" Ross

CERTIFICATE OF SERVICE

I certify that on this 4th day of August 2022, I served a true and correct copy of the foregoing to the below persons through electronic filing and email.

SANFORD R. DENISON denison@baabdenison.com
MARGOT A. NIKITAS MNikitas@apfa.org
WILLIAM W. OSBORNE b.osborne@osbornelaw.com

/s/ Kerri Phillips
Kerri Phillips